

October 27, 2003

Mr. Robert G. Smith  
Technical Consultant  
Erico International  
P.O. Box 1921  
Southern Pines, NC 28387

Dear Mr. Smith:

I am responding to your letter dated September 23, 2003, to Mr. R. William Borchardt in which you describe your concern regarding the Nuclear Regulatory Commission's (NRC's) approval of the Bar-Lock coupler assembly submitted in Tennessee Valley Authority's (TVA's, the licensee's) Topical Report No. 24370-TR-C-001, "Alternate Rebar Splice - Bar-Lock Mechanical Splices" [ADAMS Accession number ML020780612]. TVA submitted the topical report and related amendment to the Updated Final Safety Analysis to allow the use of Bar-Lock coupler assemblies in the repair of the shield building at Sequoyah Nuclear Plant, Unit 1 (SQN1). Your concern focuses on the potential for misuse of the NRC approval of the Bar-Lock coupler assembly for #6 and #8 rebars for broader application in the repair of containment structures. In addition, the NRC staff appreciates your observations concerning the coupler test program.

The licensee submitted the topical report and related amendment request to allow the use of a coupler assembly not originally intended for nuclear applications. The test program described, as well as the various comparisons to industry standards, are meant as a means to establish an acceptable level of safety and quality for use in specific nuclear applications at SQN1. Any reference in the NRC's correspondence to meeting an industry standard should be viewed as the NRC staff's determination that the licensee has demonstrated in this specific instance under the submitted condition that an industry standard was met. This should in no way be construed to be a comment on the adequacy of any other coupler or industry standard.

More specifically, in letters dated March 13 and April 24, 2003 [ADAMS Accession Nos. ML030720220 and ML031140078], the NRC transmitted approval of the Bar-Lock topical report and Safety Evaluation (SE) related to the use of the Bar-Lock topical report for SQN1. The March 13, 2003, letter states that, "this acceptance applies only to the Bar-Lock coupler assembly using American Society for Testing Maintenance A615 Grade 60 material in the #6 and #8 sizes for use on noncontainment (i.e., shield building) applications at TVA's SQN Units 1 and 2." The approval in both the topical report and related SE discusses use of the #6 and #8 sizes. The statement in the SE regarding the couplers meeting American Society of Mechanical Engineers strength requirements should not be construed to expand the use of #6 and #8 splices to any application except the specific request made by TVA for SQN1. Any statements contained within the topical approval and related SE should be viewed within the context of the licensee's request and stated acceptance.

R. Smith

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Based on SQN's unique configuration, the specificity of TVA's request and the NRC's approval, the NRC staff firmly believes that the cited limitations are very specific and clear as to the applicability of the NRC approval. NRC staff further believes that its approval leaves no room for misinterpretation that may lead to possible misuse of Bar-Lock coupler assemblies in the repair of containment structures as you indicated.

In conclusion, it is evident that we share your same view on the limitations for use of Bar-Lock coupler assemblies, and believe that our letters of March 13 and April 24, 2003, to TVA clearly articulate the NRC position without any ambiguity.

Should you have any further questions or concerns, please feel free to contact Mr. John Ma at (301) 415-2732 or Ms. Eva Brown at (301) 415-2315.

Sincerely,

Brian Sheron, Associate Director */RA/*  
for Licensing Project and Technical Analysis  
Office of Nuclear Reactor Regulation

Docket No. 50-327

cc: See next page

R. Smith

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